As of May 27, 2017, the Washington Administrative Code (WAC) requires all applicants for licensing and all licensed home and center early learning providers to test their water supply for lead and copper if it is used for drinking, cooking, or preparing infant formula of food.

Use this guidance to help you identify fixtures to test, find a certified lab to perform the analysis, and take appropriate follow up action. We also recommend reading 3Ts for Reducing the Lead in Drinking Water in Child Care Facilities from the Environmental Protection Agency (EPA) for information about the health effects of lead, how it gets into drinking water, ways you can help reduce exposure to lead in drinking water, and how to communicate with your parents and staff. While it can be a good source of information, you should use the guidelines below to collect your required lead and copper samples.

**Sampling Procedures**

**Before you begin sampling**

1. **Pick the fixtures you need to test:** You will have to collect a sample from each water fixture that is used for drinking, cooking, or preparing infant formula. Make a list and give each fixture a unique name (for example, Kitchen tap, Infant Area Sink, etc.). Keep this list so you can match the results you get from the lab to the fixture you tested. If you have several fixtures and it is difficult to sample all of them at once, these samples can be taken on different days. Follow this sampling procedure each time you collect a sample.

2. **Contact a certified drinking water laboratory to test your sample.** The Department of Ecology accredits all drinking water labs in Washington State. They have a list, organized by county, of all labs accredited to test drinking water samples. Find a lab nearby that has lead and copper on their list of analytes. Call the lab, tell them what testing you are doing, and make a plan to get the bottles you will need (labs usually supply these). **Samples should be collected in a 250ml bottle.**

**Collecting your samples**

You’ll collect a “first-draw” sample, which means the water has to sit in the plumbing system for at least 8 hours, but not more than 18 hours. It is easiest to collect these samples first thing in the morning. If you are running an in-home facility, try not to use the water in the home or flush toilets during the night until the samples have been collected. **If your facility is closed on weekends, do not sample on Mondays.**

- **Do not remove the aerator** from the fixture at any time during the sampling process.
- **Only sample cold water.** Make sure that cold water is the last water to go through the fixture before it sits overnight.
How to Take “First Draw” Samples

1. **First thing in the morning**, place the sample bottle under the fixture and open the cold water tap to a normal flow.

2. **Fill the sample bottle** to the shoulder or the line marked “250 ml”. Close the cap tightly.

3. **Fill out the lab form and bottle label** (if applicable).
   Some important information to capture is:
   - Name of your facility, contact and billing information
   - Collection date and time
   - Name of person collecting the sample
   - Type of sample (these are “first-draw” samples)
   - Fixture name (kitchen tap, infant area sink, etc.)

4. **Repeat this process for each fixture used for drinking, cooking, or preparing infant formula** and submit the samples to lab for analysis.

**NOTICE:** The information herein is not binding law but is merely provided for general guidance. Consult the currently enacted Revised Code of Washington (RCW) and Washington Administrative Code (WAC) for applicable rules and regulations.
What to do if your results are greater than the EPA action level for child care facilities

When you get your results from the lab, review them to see if any of the fixtures had a result above 20 parts per billion (ppb) (0.020 mg/L) for lead or 1300 ppb (1.30 mg/L) for copper. If any of your fixtures exceed these levels you should take the following steps:

- **Immediately stop serving water from the fixtures that exceed the action level** and start using bottled or packaged water for drinking, cooking, and preparing infant formula. If you are not able to provide bottled or packaged water and meet the needs of your facility, you must close until you can meet the needs with bottled or packaged water. Water from these fixtures can still be used for household uses (washing dishes, clothes, housekeeping etc).
- **Immediately contact your DEL Licensing Office.** Advise them of the lab results and the steps you are taking to protect the children at your facility.
- **Notify all parents and guardians of the test results.** It is important that you communicate with your parents and staff regarding your test results and what actions you are taking. The EPA 3T's for Reducing Lead in Drinking Water in Child Care Facilities has a section on communication and is a good resource to help you decide when, what, and how to communicate with your parents and staff.
- **Take “follow-up” samples.** Follow-up samples (often called flush samples) are designed to show whether the lead and/or copper in the first-draw sample is coming from the fixture or the plumbing behind the wall leading to the fixture. The key difference between first-draw and follow-up sampling is allowing the water to run for 30 seconds before taking the sample. Follow these steps to collect follow-up samples:
  - **Do not remove the aerator** from the fixture at any time during the sampling process.
  - **Only sample cold water.** Make sure that cold water is the last water to go through the fixture before it sits overnight.
- **Contact DEL when you get your results.** When you get your results from the follow-up samples, contact your DEL Licensing Office to discuss the results of your follow-up sampling and next steps.
- **Continue to provide bottled or packaged water.** Your DEL Licensing Office will work with you on a plan to address the lead and copper levels in your facility and find a solution which will allow you to use the tap water again. You must continue to provide packaged or bottled water until the fixtures are tested again and are below the EPA action levels for lead and/or copper.
How to Take Follow-up “Flush” Samples

1. **First thing in the morning**, open the cold water tap to a normal flow and allow the water to run for 30 seconds.

2. **After 30 seconds**, while the water is flowing place the sample bottle under the fixture and fill the sample bottle to the shoulder or the line marked “250 mL”. Close the cap tightly.

3. **Fill out the lab form and bottle label** (if applicable). Make sure you capture the same information on the lab slip (name, sample date, etc.) you captured before, and **note that these are “flush samples.”**

4. **Repeat this process for each fixture where the first draw sample exceeded the lead and or copper action level** and submit the samples to lab for analysis.

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Reduce Exposure to Lead and Copper in Drinking Water

To minimize exposure to lead in drinking water in your facility, there are several things you can do on a routine basis.

1. **Flush all drinking water fixtures.** The longer water sits unused in fixtures and plumbing, the greater the opportunity is for higher lead and copper levels in the water. At the start of each day, before using any water for drinking or cooking, turn on each cold water faucet (one at a time) and allow the water to run until it is noticeably colder. This will get rid of the water that has been sitting in the fixture and plumbing and bring in fresh water. If the fixture is used throughout the day it will help reduce the likelihood of lead and copper leaching into the water.

2. **Use only cold water to prepare food and drinks.** Hot water dissolves lead and other metals more quickly than cold water. If you need hot water to prepare food or drinks, you should draw water from the cold water tap and heat it. **Hot water from a faucet should NEVER BE USED TO PREPARE INFANT FORMULA.**

3. **Clean water fixture outlets and aerators on a regular basis.** The small screens on the end of a faucet, often called an aerator, can trap debris which may contain lead. Cleaning screens often can keep debris from building up and contributing to higher lead levels in the water you drink.

For More Information

If you have questions about testing for lead and copper at your facility, contact your local DEL Field Office.

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<tr>
<td>Aberdeen</td>
<td>360.537.4312</td>
<td>1.800.451.9994</td>
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